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Katherine Stadler

Attorneys for the Fee Committee

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC. <i>et al.</i>,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
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**STIPULATION BETWEEN BORTSTEIN LEGAL LLC
AND THE FEE COMMITTEE REGARDING THE
EIGHTH INTERIM APPLICATION OF BORTSTEIN LEGAL LLC,
SPECIAL COUNSEL TO THE DEBTORS,
FOR INTERIM COMPENSATION FOR THE PERIOD
FEBRUARY 1, 2011 THROUGH MAY 31, 2011**

**TO: THE HONORABLE JAMES M. PECK
U.S. BANKRUPTCY JUDGE**

WHEREAS, on August 15, 2011, Bortstein Legal LLC (“Bortstein”) filed the *Eighth Application of Bortstein Legal LLC, Special Counsel to the Debtors and Debtors in Possession, for Interim Allowance of Compensation* (the “Eighth Fee Application”) [Docket No. 19244] seeking interim fees in the amount of \$136,742.50 for professional services rendered and no reimbursement of out-of-pocket expenses;

WHEREAS, Bortstein regularly has received from the Debtors 80 percent of the amounts invoiced to the Debtors for professional services rendered and 100 percent of the amounts invoiced for expenses;

WHEREAS, pursuant to the *Order Appointing Fee Committee and Approving Fee Protocol* [Docket No. 3651], and consistent with the procedures set forth in the *Amended Fee Protocol* attached as Exhibit A to *Order Amending the Fee Protocol* [Docket No. 15998], counsel for the Fee Committee in Lehman Brothers Holdings, Inc. (the “Fee Committee”) has reviewed the Eighth Fee Application, issued a Confidential Letter Report on November 21, 2011, and entered into a dialogue with Bortstein regarding this application; and

WHEREAS, as a result of this dialogue, Bortstein has agreed to accept the Fee Committee’s proposed disallowance of fees in the amount of \$1,202.50 for professional services rendered.

STIPULATION

NOW, THEREFORE, the Fee Committee and Bortstein hereby stipulate and agree that the Court may enter an order (to be submitted subsequently) approving Bortstein’s request for interim compensation in the reduced amount of \$135,540 in fees.

[Signature Page Follows]

Dated: Madison, Wisconsin
December 20, 2011

GODFREY & KAHN, S.C.

By: /s/ Katherine Stadler
Katherine Stadler
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Attorneys for Fee Committee

Dated: New York, New York
December 19, 2011

BORTSTEIN LEGAL, LLC

By: /s/ Lawrence A. Bortstein
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